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Attorneys for the
United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	1:12-cr-00078-LJO-SKO
)	
Plaintiff,)	
)	
v.)	STIPULATION AND PROTECTIVE
)	ORDER BETWEEN THE UNITED
BEE JAY VANG,)	STATES AND DEFENDANT BEE JAY
aka Bee Jen Vang,)	VANG, aka Bee Jen Vang, aka
aka Kou Vang,)	Kou Vang
)	
)	
Defendant.)	
)	
)	
)	

WHEREAS, the discovery in this case is voluminous and contains a large amount of personal and confidential information including but not limited to Social Security numbers, dates of birth, bank account numbers, telephone numbers, and residential addresses ("Protected Information"); and

WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the unauthorized disclosure or dissemination of this information to anyone not a party to the court proceedings in this matter;

1 The parties agree that entry of a stipulated protective order is
2 appropriate.

3 THEREFORE, Defendant Bee Jay Vang, aka Bee Jen Vang, aka Kou Vang
4 ("Defendant"), by and through his counsel of record ("Defense Counsel"),
5 and the United States of America, by and through Assistant United States
6 Attorney Grant B. Rabenn, hereby agree and stipulate as follows:

7 1. This Court may enter a protective order pursuant to Rule 16(d)
8 of the Federal Rules of Criminal Procedure, and its general supervisory
9 authority.

10 2. This Order pertains to all discovery provided to or made
11 available to Defense Counsel as part of discovery in this case
12 (hereafter, collectively known as "the discovery").

13 3. By signing this Stipulation and Protective Order, Defense
14 Counsel agrees not to share any documents that contain Protected
15 Information with anyone other than Defense Counsel attorneys, designated
16 defense investigators, and support staff. Defense Counsel may permit
17 Defendant to view unredacted documents in the presence of his attorney,
18 defense investigators, and support staff. The parties agree that
19 Defense Counsel, defense investigators, and support staff shall not
20 allow Defendant to copy Protected Information contained in the
21 discovery. The parties agree that Defense Counsel, defense
22 investigators, and support staff may provide Defendant with copies of
23 documents from which Protected Information has been redacted.

24 4. The discovery and information therein may be used only in
25 connection with the litigation of this case and for no other purpose.
26 The discovery is now and will forever remain the property of the United
27 States of America ("Government"). Defense Counsel will return the
28 discovery to the Government or certify that it has been shredded at the

1 conclusion of the case.

2 5. Defense Counsel will store the discovery in a secure place and
3 will use reasonable care to ensure that it is not disclosed to third
4 persons in violation of this agreement.

5 6. Defense Counsel shall be responsible for advising Defendant,
6 employees, and other members of the defense team, and defense witnesses
7 of the contents of this Stipulation and Order.

8 7. In the event that Defendant substitutes counsel, undersigned
9 Defense Counsel agrees to withhold discovery from new counsel unless and
10 until substituted counsel agrees also to be bound by this Order.

11 8. Defense Counsel reserves the right to later seek to have the
12 terms of this Order modified or revoked. Defense Counsel agrees to
13 return the discovery to the Government in its complete form if the terms
14 of this Order are modified or revoked if so requested by the United
15 States.

16 IT IS SO STIPULATED.

17 DATED: April 10, 2012

BENJAMIN B. WAGNER
United States Attorney

19 By: /s/Grant B. Rabenn
20 GRANT B. RABENN
21 Assistant U.S. Attorney

22 DATED: April 10, 2012

By: /s/Richard A. Beshwate Jr.
23 RICHARD A. BESHWATE JR.
Attorney for Defendant

24 IT IS SO ORDERED.

25 **Dated: April 11, 2012**

/s/ Lawrence J. O'Neill
UNITED STATES DISTRICT JUDGE